



# Public Health

Re: Comments requested by EPA for New Owner clean Air Act Audit Program

To Whom It May Concern,

June 4, 2018

Boulder County Public Health (BCPH) generally supports the [New Owner Clean Air Act \(CAA\) Audit Program](#) for oil and natural gas exploration and production facilities. BCPH would like to take this opportunity to comment on this program and provide potential enhancements to create greater protections to public and environmental health. We find that as envisioned, the program is both efficient and cost effective, and has the potential to provide valuable information regarding compliance issues to new owners. The program provides flexibility to new owners to bring newly acquired facilities into compliance and avoid the potential for costly enforcement actions.

Environmental auditing through the New Owner CAA Audit Program serves to enhance the protection of human health and the environment by identifying, correcting, and preventing issues. Further, we find that this auditing also would benefit operators, as evidenced by the [Range Resources case study](#), which shows that the program promotes responsible operations in the oil and gas industry, and further enhances the safe and efficient production of oil and natural gas.

The New Owner CAA Audit Program is a positive step forward for facilities where a change of ownership has recently occurred. Ideally, Boulder County Public Health would encourage this program to be broader. We would encourage EPA to require all operators to perform an environmental audit of all of their facilities periodically. Specifically, the design of vapor control systems should be fully analyzed to be certain that they are designed and performing as expected. Oil and gas operators generally should be able to show that their operations are fully compliant with the Clean Air Act. Perhaps an enhanced requirement (periodic for all facilities instead of only at change of ownership) could be applied to those facilities operating within non-attainment areas.

In our region, the Denver Metro North Front Range (DMNFR) Non-Attainment Area continues to struggle to achieve attainment with 2008 NAAQS. Emissions from oil and gas production in the DMNFR are one of the largest contributors of ozone precursors. To protect air quality and public health, operators within DMNFR should be required to perform this type of analysis on all of their facilities. Colorado's Air Pollution Control Division (APCD) has recently put out recommended

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guidelines for similar analyses, but these are not required. A strong rubric set forward in the New Owner Clean Air Act (CAA) Audit Program could both ease and secure compliance and make a positive air quality impact at scale, particularly if expanded to all facilities within Non-Attainment Areas.

Thank you for your consideration,  
Sincerely,

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